

EXHIBIT 102-B
Redacted Version of
Document Sought to be Sealed

From: Lesley Weaver <lweaver@bfalaw.com>
Sent: Sunday, May 8, 2022 11:54 AM
To: Blume, Robert C.; Cari Laufenberg; Ring, Rose; *** Service-FB-CA_MDL
Cc: Daniel Garrie; Anne Davis; David Ko; Derek Loeser; Matt Melamed; Julie Law
Subject: Re: FB 30(b)(6) - Topic 4 Request for Documents
Attachments: EY-FB-00005176_native.pdf; FB-CA-MDL-02075073_image.pdf; T4-023_PwC_CPUP_FB00007766.pdf

Good morning, and Happy Mother's Day to all,

Apologies for the email over the weekend, but Plaintiffs are obliged to comply with the requirement of the Amended Deposition Protocol that Plaintiffs provide, three days in advance, a list of documents that Plaintiffs may mark and/or contain subject matter related to Topic 4 on Wednesday, May 11.

Documents containing information relating to Topic 4 are listed below to assist in your preparation of the witness. Some of these documents are lengthy; to clarify, for those documents, Plaintiffs will focus on the portions of them that discuss associating data and information through identifiers, for deletion or other purposes. Because for most of these processes Plaintiffs have not received schema, wiki, protos or manuals discussing them, the documents selected have referenced such procedures but may not be solely focused on them.

New identifiers mentioned in some of these documents but not previously referenced by Facebook in its responses the Special Master include the [REDACTED] PSID; tokens (referred to in at least one document as a unique identifier); cookies containing information such as [REDACTED]; and, for example, the process of searching for user data for deletion purposes through the [REDACTED] query (see FB_CA_MDL-02247472-475). Plaintiffs seek to understand what these identifiers are and, at a high level, how they function.

FB-CA-MDL-01960039-66
PwC_CPUP_FB- 00007807-7917
PwC_CPUP_FB00010406-446
PwC_CPUP_FB 00014384-451
FB-CA-MDL-02247472-475
FB-CA-MDL-00191798-808
PwC_CPUP_FB 00020372-381
FB-CA-MDL-02087686
FB-CA-MDL-00405232-250
EY-FB-00006940-45
FB-CA-MDL-00035435-51
FB-CA-MDL-00019339-48
PwC_CPUP_FB 00031206-210
EY-FB-00005274-76
FB-CA-MDL 02073244-47
FB-CA-MDL-02914373-425
FB-CA-MDL-01952478
PwC_CPUP_FB 00022060-123
PwC_CPUP_FB 00030728-46
PwC_CPUP_FB 00020-124
FB-CA-MDL-00220812-813

Plaintiffs will also seek to understand Facebook's responses to Special Master Garrie's questions regarding Facebook's ability to search and/or delete users' content and information from data sources using such identifiers.

Enjoy the day.

Best,

Lesley

On May 6, 2022, at 4:22 PM, Lesley Weaver <lweaver@bfalaw.com> wrote:

Counsel,

As referenced in our meet and confer today, Plaintiffs write to request production of documents that set forth policies and procedures relating to Topic 4, set for this Wednesday, May 11. We will be identifying documents relating to the deposition on Sunday, but are writing to request production of certain materials ahead of time.

To frame the request, here is Topic 4: Facebook's processes of pseudonymization, de-identification, re-identification, association, and deletion of User Data and Information.

Specifically, three documents, all attached, are exemplars of the kinds of documents reflecting at least in some way summaries of Facebook's policies and procedures relating to these topics that we would expect to see, but which Plaintiffs have not found, in Facebook's current productions:

1. A 2013 email produced by third party PriceWaterhouse Coopers at PwC_CPUP_FB00007766 includes excerpts from a wiki regarding how to delete user data. However, it appear to be incomplete. Plaintiffs have diligently searched Facebook's productions and have not found any versions similar to this document. If Facebook has produced such wikis, we ask that Facebook identify them by Bates number. If Facebook has not, Plaintiffs ask that the documents be produced sufficiently ahead of the deposition to allow time for analysis and review.
2. A wiki from 2018 relates to directions for ASID conversions and mapping of ASID to UID, and "in the opposite direction." See the email at [FB-CA-MDL-02075073](#) that Wiki Bot created the wiki page "[REDACTED]"). However, this document appears to be identifying possible exploitation of the procedure and does not produce an overall view of how these identifiers are created, used and mapped.
3. A 2017 Wiki produced from Ernst & Young refers to a number of comprehensive descriptive documents about Hive, including an FAQ. See [EY-FB-00005176](#) While not all are necessarily related to Topic 4, the documents themselves clearly provide information that would be incredibly useful as we work together to identify efficient ways to search Hive for user data, among other topics. See, for example, the reference to "Open Source Hive Manual." Setting aside the broader issues, this document references the kinds of schemas and descriptive notes we would expect to see relating data architecture. For example, see references to the "Hive Architecture Diagram," "Hive Command Execution Flow," "Data/Hive/AuditLogs Info about every executed Hive query is logged here," and "Data/Hive/DevCheat Sheet."

We reference these documents as exemplars of the kinds of documents Plaintiffs would have expected to be produced at this juncture in the case. We note that two of the three were produced by third parties and not Facebook.

More concretely, ahead of the Topic 4 deposition, Plaintiffs renew their ask for production of wikis and/or internal documents that discuss how identifiers are created, used, pseudonymized, associated, de-identified, re-identified and deleted. The list of identifiers includes not only the identifiers that Facebook revealed to Special Master Garrie (FB ID, UID, [REDACTED] and ASID), but also identifiers used to track users off platform, such as the DATR, _fbp, _fbc, XS/C_, USER XS/C_ and fr cookies, and any other identifiers used throughout the Class Period.

To be clear, Plaintiffs will proceed with the deposition and will also provide further documents that may be discussed during the deposition 72 hours ahead of the deposition, as required by the Amended Deposition Protocol. However, we write in advance in the hope that Facebook will produce documents that can streamline the deposition ahead of time.

Thanks very much.

Lesley

Lesley E. Weaver
Partner
Bleichmar Fonti & Auld LLP
555 12th Street, Suite 1600
Oakland, CA 94607
Direct: 415 445 4004
Mobile: 415 797 2617
www.bfalaw.com